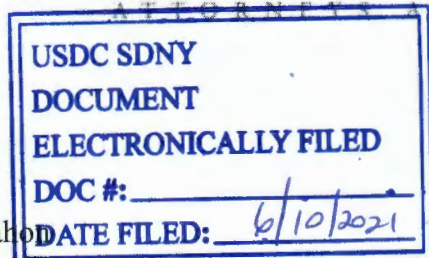


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May 26, 2021

MEMO ENDORSED

VIA ECF

Hon. Colleen McMahon
United States District Court
Southern District of New York
500 Pearl St., Room 2550
New York, New York 10007

A handwritten signature in blue ink, appearing to read 'Colleen McMahon'. Below the signature is the date '6/10/2021' written in blue ink.

Re: Kolmar Americas Inc. v. Mycone Dental Supply Co., Inc.; 1:21-CV-2361-CM

Dear Judge McMahon:

We represent Plaintiff Kolmar Americas Inc. ("Plaintiff") and write jointly with counsel for Defendant Mycone Dental Supply Co., Inc. ("Defendant") to respectfully request a stay of discovery pending resolution of Defendant's Motion to Dismiss dated April 20, 2021, which was fully briefed on May 10, 2021, ECF No. 7 (the "Motion"). The Motion seeks dismissal of the Complaint, in its entirety. The parties wish to avoid incurring unnecessary discovery expenses in the event that resolution of the Motion impacts the scope of discovery. In furtherance of the proposed stay, the parties have therefore enclosed a proposed case management order with discovery deadlines that run from the date an order is entered on the Motion.

For the foregoing reasons, the parties respectfully request that discovery is stayed pending resolution of the Motion to Dismiss and that the enclosed proposed cases management order is entered to govern discovery deadlines in the event the Motion is denied. This is the parties first request for a stay.

Respectfully submitted,

Lennon Murphy & Phillips LLC

Klehr Harrison Harvey Branzburg LLP

/s/ Patrick F. Lennon
Patrick F. Lennon

/s/ Matthew J. McDonald
Matthew J. McDonald

Counsel for Plaintiff

Counsel for Defendant

Enclosure